IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Chapter 13

ELIZABETH MILLER

Case No. 22-11747-MDC

Debtors.

DEBTOR'S OBJECTION TO CERTIFICATION OF DEFAULT

ELIZABETH MILLER (the "Debtor"), by and through their undersigned counsel, hereby object to the Certification of Default (the "Certification") filed by M&T Bank (the "Movant"). The Debtor denies the facts alleged in the Certification, and further, deny that the Debtor has defaulted in their post-petition obligations to the Movant. To the extent that the Debtor has defaulted, the Debtor intends to cure such default on or before the date of the hearing on the Certification.

Dated: <u>July 26, 2023</u> /s/ <u>Brad J. Sadek</u>

Brad J. Sadek, Esquire Sadek Law Offices Two Penn Center 1500 JFK Boulevard, Suite 220 Philadelphia, Pennsylvania 19102 (215) 545-0008 brad@sadeklaw.com

Counsel to the Debtor